

United States District Court

DISTRICT OF NEW HAMPSHIRE

United States of America

v.

Ian Freeman

CASE NUMBER: 1:21-cr-000041

ASSENTED TO MOTION TO REMOVE COURT-ORDERED ELECTRONIC-MONITORING SOFTWARE FROM DEFENDANT'S ELECTRONIC DEVICES

NOW COMES the Defendant, Ian Freeman, by and through counsel, and respectfully moves that this Honorable Court order the removal of all court-ordered monitoring from all electronic devices owned and operated by the Defendant.

As grounds for and in support of, the Defendant states as follows:

1. The Defendant is awaiting trial scheduled to begin on December 6, 2022.
2. Previously, an Assented To Motion To Oder The Removal Of Spyware From Defendant's Electronic Devices was filed and granted.
3. The language used in that motion was imprecise as to what the parties sought to remove.
4. The Government would like to clarify neither the US Attorney's Office nor federal law enforcement has placed any spyware on the defendant's electronic devices. The defense agrees.
5. Both parties agree to remove court-ordered electronic monitoring software placed on Mr. Freeman's devices by Federal Probation which is what the previous motion intended to address.

6. The Support staff for the defense has been in contact with Assistant US attorneys Georgiana MacDonald, Esq. and Seth Aframe, Esq. who assent to the granting of this motion.

WHEREFORE, The Defendant prays that this Honorable Court order the removal of all court-ordered electronic monitoring on his electronic devices for the reasons stated in this motion.

Respectfully Submitted,

November 29, 2022

Date

/s/ Mark L Sisti

Signature

Mark L. Sisti

Print Name

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CERTIFICATION

I hereby certify that a copy of this appearance was forwarded to Seth Aframe, Esq. and Georgiana MacDonald, Esq of the U.S. District Attorney's Office, electronically through EFC on November 29, 2022.

November 29, 2022

Date

/s/ Mark L Sisti

Signature

Mark L. Sisti

Print Name